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Eaton Sugar Beet Factory
Eaton, CO - EPA Region VIII
POLREP #23

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Eaton Sugar Beet Factory - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: POLREP #23
Eaton Sugar Beet Factory
08VA
Eaton, CO
Latitude: 40.5250000 Longitude: -104.7020000

To:
From: Pete Stevenson, OSC
Date: 3/1/2013
Reporting Period:

1. Introduction**1.1 Background**

Site Number:	08VA	Contract Number:	
D.O. Number:		Action Memo Date:	4/28/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/29/2011	Start Date:	4/29/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This time-critical removal action was initiated on 4/29/11 by providing 24 hour security at the old sugar beet factory in downtown Eaton. Local teenagers were hanging out, and, despite the best efforts of the town of Eaton and the Eaton Police, the teenagers were periodically entering the building and endangering themselves. Asbestos is found throughout the buildings on Site as well as in the soil and debris outside.

1.1.2 Site Description

Construction of the Eaton Sugar Beet Factory (ESBF) began in 1902 by the Kilby Manufacturing Company of Cleveland, Ohio. Beet processing at the Site continued for over 70 years. The town of Eaton intends to redevelop the abandoned property into an industrial business park that is rail-served with a mini-transload facility. The Site was initially assessed by the EPA8 Brownfields program in 2009, which produced a Phase II Analytical Results Report. A Site visit was conducted by the EPA8 Removal program in 2010. Asbestos fibers were found throughout the buildings and all over the property in the soil and debris during the April and July 2010 sampling events. There are also a number of drums containing liquid and/or hazardous waste. Site features include an abandoned 4-story building (the former beet processing factory), old and dilapidated boiler, machine shop, lime, storage houses, an office building, and other miscellaneous structures. Most structures have deteriorated to the point that asbestos materials on or in the buildings have migrated outside the buildings. Containers of miscellaneous compounds are found in various locations around the Site. 'Lime piles' (lime is a spent process chemical) lie in the open in the northeast portion of the Site. When interviewed, a previous facility representative recalled that piping insulation for the main ESBF factory building was covered with asbestos at the Site. Reportedly, asbestos sheets would be brought to the Site where workers would use a hammer mill to break up the asbestos sheets. Workers would then mix broken asbestos pieces and cheese cloth to make building piping insulation. Such practices continued until 1968, at which time ESBF began using fiberglass insulation.

1.1.2.1 Location

The 43.11 acre Site is located near the intersection of US Highway 85 and County Road 74, Eaton, Weld

County, CO (lat / long: 40.5250 N / -104.7020 W). The Site is bordered by residential housing, commercial real estate, and industrial businesses. Farther afield, the area is mostly agricultural.

1.1.2.2 Description of Threat

The ESBF property was unsecured and abandoned. Graffiti and evidence of vandalism and/or indiscriminant salvaging, both inside and outside of Site structures, is apparent. Local youths apparently use the lime piles for biking, as evidenced by the eroded tracks on the piles. EPA8 Brownfields-support contractors conducted extensive Site investigations and sampling in April and July 2010. Hazardous wastes: Haz-cat screening of miscellaneous containers found at scattered Site locations showed presence of chlorinated and/or corrosive solvents as well as flammable compounds and oxidizers. Lead-based paint (LBP): Field and laboratory analysis of collected samples showed presence of LBP on several structures' interior surfaces. Asbestos: Asbestos was found in concentrations exceeding 1% inside principal Site structures, and in concentrations exceeding trace in various debris piles and/or exposed surface areas scattered elsewhere around the Site. Asbestos was friable wherever sample concentrations above trace were found. Approximately 138,000 sq ft of asbestos-containing material (ACM) was identified inside various Site structures. Approximately 5,000 cubic yards of ACM and/or ACS ('soils') were identified elsewhere on the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See above

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Site security was set up on Friday evening, 4/29/11. ERRS, START and EPA mobilized to the Site on November 15, 2011, and began setting up for an extensive asbestos abatement project. Clearing and grubbing began around the main sugar process building. Building outer walls are being sealed with foam, plastic, caulk, adhesive and plywood. Entry/egress building with shower trailers has been constructed at the main plant door. The area outside all process buildings has been cleaned up and the debris has been shipped offsite. Entry into the building has been made, and equipment has been staged inside to begin the inside containment process. Zones 1, 2, 3, 9, 4, 5/6, 7/8a, 8, 10, and 12 have passed final clearance. The transite roofing material on the warehouse has been removed. The demolition of Zone 3a is complete. Contaminated soil and debris has been removed from the northern section of the property. One to four lifts of soil have been removed from areas previously deemed contaminated by soil sampling. The area under the water tank has been cleaned to ND, as have 2 other soil removal areas. The southern area around the trees (removed due to asbestos in the roots) and the railroad tracks have been cleaned up again, and have just been re-sampled. The third area to the east around a trench disposal area has been recleaned the third time and sampled again. Various areas around the buildings that are asphalt and concrete surfaces, have been cleaned up and have passed a visual inspection. A few areas remain. Transformers were sampled and found to contain non-regulated oil. Provided the town with sampling results.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Fri ACM debris end dumps	Debris	4193 CY	Multiple	NA	Landfill
Fri ACM debris roll offs	Debris	3969 CY	Multiple	NA	Landfill
Non-Fri ACM	Debris	159 CY	Multiple	NA	Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

Await soil sampling results in the two remaining soil clean up areas. Continue clean up and visual inspection of asphalt and concrete-covered areas. Sort through debris immediately north of the factory. Sample large sub-surface tank believed to be associated with factory wastewater recycling which was found under the debris immediately north of the factory.

2.2.1.1 Planned Response Activities

A large heater outside the building on the east side was found to contain a rock wool and asbestos insulation layer between the fire bricks, necessitating the dismantling of the structure. This has been contained and is being abated by hand from the inside out, using the metal jacket for containment.

2.2.1.2 Next Steps

Dispose of hazardous and industrial waste drums and Bunker C oil. Dig up two pipes containing Bunker C oil.

2.2.2 Issues

None.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section**2.4.1 Narrative**

The original Action Memorandum ceiling was \$2,625,440.00. A second ceiling increase request was approved for \$5,922,000.00. An Action Memorandum Amendment Ceiling Increase Request was concurred on by HQ on August 31, 2012. The final total project ceiling is \$9,214,000.00.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$9,114,000.00	\$7,430,000.00	\$1,684,000.00	18.48%
TAT/START	\$100,000.00	\$48,340.00	\$51,660.00	51.66%
Intramural Costs				
Total Site Costs	\$9,214,000.00	\$7,478,340.00	\$1,735,660.00	18.84%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities**3.1 Unified Command****3.2 Cooperating Agencies**

Town of Eaton
CDPHE Air Program Asbestos Group and Solid Waste

4. Personnel On Site

EPA OSC, 15 ERRS, one START part time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

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